

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: GOOGLE DIGITAL ADVERTISING  
ANTITRUST LITIGATION

This Document Relates to:

*AIM Media Ind. Operating, LLC v. Google, LLC*,  
No. 1:21-cv-06912-PKC (S.D.N.Y.)

*AIM Media Midwest Operating, LLC v. Google, LLC*, No. 1:21-cv-06884-PKC (S.D.N.Y.)

*AIM Media Tex. Operating, LLC v. Google, LLC*,  
No. 1:21-cv-06888-PKC (S.D.N.Y.)

*Brown Cnty. Publ'g Co., Inc. v. Google, LLC*, No.  
1:21-cv-06915-PKC (S.D.N.Y.)

*Capital Region Indep. Media LLC v. Google LLC*,  
No. 1:22-cv-06997-PKC (S.D.N.Y.)

*Clarksburg Publ'g Co., d/b/a WV News v. Google, LLC*, No. 1:21-cv-06840-PKC (S.D.N.Y.)

*Coastal Point LLC v. Google, LLC*, No. 1:21- cv-  
06824-PKC (S.D.N.Y.)

*Eagle Printing Co. v. Google, LLC*, No. 1:21- cv-  
06881-PKC (S.D.N.Y.)

*ECENT Corp. v. Google, LLC*, No. 1:21-cv- 06817-  
PKC (S.D.N.Y.)

*Emmerich Newspapers, Inc. v. Google, LLC*, No.  
1:21-cv-06794-PKC (S.D.N.Y.)

*Flag Publ'ns, Inc. v. Google, LLC*, No. 1:21-cv-  
06871-PKC (S.D.N.Y.)

*Gale Force Media, LLC v. Google, LLC*, No. 1:21-  
cv-06909-PKC (S.D.N.Y.)

*Gould Enters., Inc. v. Google, LLC*, No. 1:22-cv-  
01705-PKC (S.D.N.Y.)

*HD Media Co., LLC v. Google, LLC*, No. 1:21-cv-  
06796-PKC (S.D.N.Y.)

*Journal Inc. v. Google, LLC*, No. 1:21-cv-06828-  
PKC (S.D.N.Y.)

*Neighborhood Newspapers, Inc. v. Google LLC*,

Case No. 1:20-cv-03010 (PKC)

**DECLARATION OF KEVIN J.  
ORSINI IN SUPPORT OF META  
PLATFORMS, INC.'S RESPONSE  
IN SUPPORT OF NEWSPAPER  
PLAINTIFFS' MOTION TO SEAL**

No. 1:21-cv-10188-PKC (S.D.N.Y.)

*Robinson Commc'ns, Inc. v. Google, LLC*, No. 1:21-cv-08032-PKC (S.D.N.Y.)

*Rome News Media, LLC v. Google LLC*, No. 1:21-cv-10186-PKC (S.D.N.Y.)

*Savannah Publ'g Co. v. Google, LLC*, No. 1:22-cv-01693-PKC (S.D.N.Y.)

*Something Extra Publ'g, Inc. v. Google, LLC*, No. 1:21-cv-09523-PKC (S.D.N.Y.)

*Southern Cmty. Newspapers, Inc. v. Google, LLC*, No. 1:22-cv-01971-PKC (S.D.N.Y.)

*Times Journal, Inc. v. Google LLC*, No. 1:21-cv-10187-PKC (S.D.N.Y.)

*Union City Daily Messenger, Inc. v. Google, LLC*, No. 1:22-cv-01704-PKC (S.D.N.Y.)

*Weakley Cnty. Press, Inc. v. Google, LLC*, No. 1:22-cv-01701-PKC (S.D.N.Y.)

I, Kevin J. Orsini, hereby declare as follows:

1. I am a member of the law firm Cravath, Swaine & Moore LLP. I am a member in good standing of the bar of the State of New York.
2. I submit this declaration in support of Meta Platforms, Inc.'s Response in Support of the Newspaper Plaintiffs' Motion to Seal (Dkt. No. 323).
3. Attached hereto as Exhibit A is a true and correct copy of an email chain exchanged between counsel for Meta Platforms, Inc. and counsel for the Newspaper Plaintiffs in each of the above captioned actions during the period of October 7, 2022 to October 18, 2022.
4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 19, 2022, in New York, New York.

/s/ Kevin J. Orsini  
Kevin J. Orsini